

GIBSON DUNN

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July 30, 2025

Client: 14313-00094

VIA ECF

The Honorable Edgardo Ramos
United States District Court
for the Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

Re: Johansen v. Sony Music Entertainment, No. 19-cv-01094 (ER)

Dear Judge Ramos:

I represent defendant Sony Music Entertainment ("SME") in the above-captioned action and am providing this status update on behalf of both Plaintiffs and Defendant.

On February 23, 2024, the parties jointly submitted a letter advising the Court that the parties had reached an agreement in principle to settle all claims in this case, subject to documentation. (Dkt. No. 178). On February 26, 2024, the Court entered an Order staying all proceedings in this action pending submission and review of papers in furtherance of the proposed settlement. (Dkt. No. 179). On June 10, 2024, SME requested the stay be extended until July 15, 2024 in order to allow the parties additional time to negotiate and execute a stipulation of settlement. (Dkt. No. 180). The Court granted the request on June 11, 2024. (Dkt. No. 181). On July 19, 2024, SME requested the stay be extended until September 16, 2024 in order to allow the parties additional time to negotiate and execute a stipulation of settlement. (Dkt. No. 183). The Court granted the request on July 23, 2024. (Dkt. No. 185). The Parties then jointly requested another stay of all proceedings on September 24, 2024 until October 27, 2024. (Dkt. No. 188.)

Throughout this time, the parties have been working diligently to draft a stipulation of settlement. Navigating the intersection of the complexities of Copyright law and the mechanics of a class action settlement have proven to be enormously challenging. The parties have had multiple calls to discuss the draft settlement terms and have exchanged five drafts of the longform settlement to date after agreeing on deal terms. In addition, the parties have devoted time to addressing issues related to the passing of named plaintiff David Johansen.

The parties are hopeful that they have cleared the most significant hurdles but require additional time to finish negotiating the final terms of the stipulation of settlement. Plaintiffs' counsel believes that given the relatively small number of outstanding issues, the parties can, with reasonable and diligent efforts, conclude the stipulation of settlement by September 30, 2025. Sony and its counsel are not quite as optimistic, and to hopefully avoid burdening the Court with further requests, proposed the stay should be extended until November 25, 2025. In the

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interest of cooperation, the parties have agreed to jointly request a stay through until October 31, 2025.

Sincerely,

GIBSON, DUNN & CRUTCHER LLP

/s/ Jeremy S. Smith

Jeremy S. Smith

Cc: All Counsel of Record (via ECF)